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September 30, 2024

**Via Electronic Filing**

The Hon. Lewis J. Liman U.S.D J.  
U.S. District Court, Southern District of New York  
500 Pearl Street, Courtroom 15C  
New York, NY 10007

Re: *Diego Alvarez-Miranda Ezpeleta, individually and on behalf of all others  
similarly situated v. FurtherEd, Inc. d/b/a Lawline*  
Case No.: 1:24-cv-06709-LJL

Dear Honorable Judge Liman:

This law firm represents Defendant FurtherEd, Inc. d/b/a Lawline (“Defendant”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rule 1, this letter respectfully serves to request an extension of Defendant’s time to reply or otherwise respond to Plaintiff’s Complaint to, through and including October 30, 2024.

This is the first request of its nature and is made on consent of counsel for Plaintiff and the Putative Class. If granted, this request would not affect any other scheduled deadlines, as there are no hearings currently on calendar.

The basis of the request is that Defendant has only recently engaged counsel. In light of the foregoing, the undersigned requires additional time to gather information from Defendant and investigate the allegations of the Complaint.

In light of the foregoing, it is respectfully requested that the Court extend Defendants’ time to reply or otherwise respond to Plaintiff’s Complaint from September 30, 2024 to, through and including, October 30, 2024.

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Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

MINTZ LEVIN COHN FERRIS GLOVSKY AND  
POPEO, P.C.

By: /s/ Erin E. Galliher

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*Attorneys for Defendant*

*\* Pro Hac Vice Application Forthcoming*

VIA ECF: All Counsel